

EXHIBIT 30

Document Details

Document No: CC-SOP-000019
Document Title: Downstream Customer Monitoring and Reporting
Document State: Effective
Document Version: 1.0
Release Date: 25 Jan 2018 16:16:30 GMT -04:00
Description: This SOP outlines the ¿know your customers¿ customers¿ due diligence process for downstream customers.

Signatures:

Signed By : Brantley, Eric (branter)
Decision : Approved
Decision Date : 05 Dec 2017 15:55:09 GMT -04:00
Role : CMM Author Role
Purpose : Workflow for Ethics & Compliance SOPs
Meaning Of Signature : CMM_As the Author, I have written this document and attest to its accuracy and completeness.

Signed By : Feltz, Margaret (feltzm)
Decision : Approved
Decision Date : 05 Dec 2017 16:02:05 GMT -04:00
Role : CMM Dept Approver Role
Purpose : Workflow for Ethics & Compliance SOPs
Meaning Of Signature : CMM_As the Department Approver, I have reviewed this document for accuracy and completeness.

Signed By : Stroud, Alexis (stroual)
Decision : Approved
Decision Date : 19 Jan 2018 16:11:27 GMT -04:00
Role : CMM Peer Review Role
Purpose : Workflow for Ethics & Compliance SOPs
Meaning Of Signature : CMM_As the Peer Reviewer, I have reviewed this document for accuracy and completeness.

Owning Departments:
STM Corporate Compliance

Cross Ref Departments:

Printed On: 25 Jan 2018 4:29:50 PM GMT -04:00
Printed For: Greco, Adele (coppeya)
Printed By: Greco, Adele (coppeya)
Print Reason: Contingency Copy

**PURDUE PHARMA L.P. and ASSOCIATED US COMPANIES
STANDARD OPERATING PROCEDURE**

SOP NUM.:	CC-SOP-000019
TITLE:	DOWNSTREAM CUSTOMER MONITORING AND REPORTING

1. PURPOSE

This SOP outlines the “know your customers’ customers” due diligence process for downstream customers.

2. SCOPE

This SOP applies to all direct and downstream customers purchasing Purdue schedule II-V controlled substances and List 1 chemicals as defined in 21 CFR 1310.02(a), collectively “Covered Products.”

3. DEFINITIONS

867 and/or Chargeback Data	Data detailing downstream customer purchases in dosage units of Covered Products.
ADD Program	The Abuse and Diversion Detection Program – A program designed and implemented by Purdue with the intention of ensuring that interactions with prescribers or pharmacists that reveal observations or circumstances that suggest potential concerns, generate appropriate review and follow up, with the objective of precluding promotion of Purdue’s opioid products in circumstances where there is a concern about potential abuse or diversion.
Covered Products	Purdue schedule II-V controlled substances and List 1 Chemicals.
Downstream Customer	A Drug Enforcement Administration (DEA) registered entity ordering Covered Products from a direct wholesaler/distributor customer of Purdue.
SOM	Suspicious Order Monitoring (SOM) - “The registrant shall design and operate a system to disclose to the registrant suspicious orders of controlled substances. The registrant shall inform
	CONFIDENTIAL

PURDUE PHARMA L.P. and ASSOCIATED US COMPANIES
STANDARD OPERATING PROCEDURE

SOP NUM.: CC-SOP-000019
TITLE: DOWNSTREAM CUSTOMER MONITORING AND REPORTING

the Field Division Office of the Administration in his area of the suspicious orders when discovered by the registrant. Suspicious orders include orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency." 21 CFR 1301.74(b)

4. GENERAL

Ethics & Compliance will review available 867 and/or chargeback data on a quarterly basis. Any downstream customers identified as having ordered quantities that exceeded national monthly dispensing averages and/or like customer monthly averages of Purdue controlled substances with a wholesaler/distributor will be flagged as a downstream customer of interest. After conducting due diligence, including exchanging information with the applicable wholesaler/distributor, Ethics & Compliance will refer to the DEA any downstream customer of interest for which the suspicion regarding the order quantity is not resolved or dispelled by information and/or consultation with the wholesaler/distributor.

5. PROCEDURE

I. Data Review

- A. 867 and/or Chargeback Data will be reviewed on a quarterly basis by Ethics & Compliance. Downstream Customers requiring additional due diligence will be identified based on the following criteria:
 - i. Orders of Covered Products that significantly exceed monthly dispensing averages based on IMS data and/or the wholesaler's monthly order averages from like customers.
 - ii. Orders of Covered Products that have significantly increased over previous quarter(s).
- B. ADD Program leads for pharmacies will be investigated upon receipt/notification.

CONFIDENTIAL

PURDUE PHARMA L.P. and ASSOCIATED US COMPANIES
STANDARD OPERATING PROCEDURE

SOP NUM.: CC-SOP-000019
TITLE: DOWNSTREAM CUSTOMER MONITORING AND REPORTING

C. Intelligence received from other sources such as media outlets, law enforcement, regulatory agencies, or others, of potential diversion will be investigated upon receipt/notification.

II. Conducting Due Diligence

A. When a Downstream Customer is identified during the 867 and/or Chargeback Data review, the following due diligence shall occur:

- i. Conduct an internet search of the entity to identify type of entity, location, disciplinary actions, etc.
- ii. Review other wholesaler/distributor 867 and/or Chargeback Data to determine the amount of Covered Product the Downstream Customer is obtaining from different wholesalers/distributors.
- iii. Contact wholesaler/distributor to request the average number of prescriptions the Downstream Customer fills monthly. This will help gage the size of the Downstream Customer and put the order quantities into proper perspective.
- iv. Conduct additional due diligence, as needed, requesting information showing the number of controlled prescriptions vs. non-controlled prescriptions, the percentage of controlled substance prescriptions paid in cash, and any other relevant due diligence information that would help dispel suspicions.
- v. Provide information regarding purchases from other wholesalers/distributors, excluding the names of other wholesalers/distributors, to the relevant wholesalers/distributors.
- vi. Engage Corporate Security to conduct background checks and/or site visits when deemed necessary.

If the review of available information fails to dispel the suspicion concerning the Downstream Customers' orders, or if the wholesaler/distributor fails to provide the requested due diligence

CONFIDENTIAL

PURDUE PHARMA L.P. and ASSOCIATED US COMPANIES
STANDARD OPERATING PROCEDURE

SOP NUM.: CC-SOP-000019
TITLE: DOWNSTREAM CUSTOMER MONITORING AND REPORTING

information within three (3) calendar weeks, the Downstream Customer will be referred to the DEA.

If there is evidence, not merely suspicion, of diversion, Ethics & Compliance will instruct the wholesaler/distributor to discontinue shipments of Covered Products to the Downstream Customer, and the DEA will be notified.

B. When information regarding a potential Downstream Customer is received from the ADD Program or other sources, the following due diligence shall occur:

- i. Conduct a search in the 867 and/or Chargeback Data to determine if the entity is a current or past Downstream Customer, and if so, research order history.
- ii. Conduct internet search on the entity.
- iii. Contact wholesaler/distributor for due diligence information.
- iv. Engage Director of Investigations and Rx Patrol to conduct background checks and/or site visits when deemed necessary.

If the due diligence reveals that the entity in question is a Downstream Customer, and the suspicions raised by the information provided cannot be dispelled, the Downstream Customer will be reported to the DEA.

If the information provided contains evidence of diversion, Ethics & Compliance will instruct the wholesaler/distributor to discontinue shipments of Covered Products to the Downstream Customer, and the DEA will be notified.

III. Reporting

Ethics & Compliance will send Downstream Customer information to Security & Diversion Control which will include the following information:

CONFIDENTIAL

**PURDUE PHARMA L.P. and ASSOCIATED US COMPANIES
STANDARD OPERATING PROCEDURE**

SOP NUM.:	CC-SOP-000019
TITLE:	DOWNSTREAM CUSTOMER MONITORING AND REPORTING

1. The identity of the Downstream Customer and the wholesaler/distributor(s) identified by Purdue engaged in the Covered Products transaction(s). To include each registrant's name, address, and DEA registration number;
2. The months of reported distribution of Covered Products by wholesaler/distributor to the Downstream Customer during the relevant time period;
3. The dosage amounts reportedly distributed; and
4. A brief explanation providing the reason Purdue concluded that there was a risk of diversion.

Security & Diversion Control will report the Downstream Customer information via email to the DEA with a copy to Ethics & Compliance for record keeping.

6. REFERENCES

N/A

7. CHANGE HISTORY

Version	Section	Change
N/A	N/A	New SOP

8. ATTACHMENTS

N/A

CONFIDENTIAL